



Hogan Lovells US LLP
Columbia Square
555 Thirteenth Street, NW
Washington, DC 20004
T +1 202 637 5600
F +1 202 637 5910
www.hoganlovells.com

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By Electronic Mail

Ms. Susan Bodine
Assistant Administrator
Office of Enforcement & Compliance Assurance
U.S. Environmental Protection Agency
Mail Code 2201A
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Mr. Phillip A. Brooks
Director
Air Enforcement Division
Office of Civil Enforcement
U.S. Environmental Protection Agency
Mail Code 2242A
1200 Pennsylvania Ave, N.W.
Washington, DC 20460

Re: No-Action Assurance Extension Request - Puerto Rico Electric Power Authority

Dear Ms. Bodine and Mr. Brooks:

I write on behalf of the Puerto Rico Electric Power Authority ("PREPA") to request that the United States Environmental Protection Agency ("EPA") extend components of the no-action assurance issued by EPA on October 6, 2017, extended on November 17, 2017, amended on December 19, 2017, and extended on January 31, 2018 and March 29, 2018 ("the NAA"). While PREPA has made significant progress in the face of the destruction wrought by Hurricanes Irma and Maria, significant ongoing difficulties remain.

Just last week, on April 18, 2018, PREPA suffered a major island-wide blackout associated with a line trip that occurred. Two other blackout events also occurred in April. These events are indicative of the continuing threat of electrical system disturbances, surges, and other complications that remain as PREPA strives to repair major transmission lines that are still out-of-service. Moreover, many of the challenges described in the no-action assurance request submitted to EPA on March 29, 2018 ("March 29 NAA extension request"), and in the status report submitted to EPA on March 19, 2018 ("March Status Report"), continue to affect PREPA's power restoration efforts. In these submissions, PREPA explained that it was experiencing continuing issues with the grid and attendant limitations on its generating units, particularly the Aguirre Power Complex. PREPA

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continues to face many of these same issues. Accordingly, as described below, PREPA is requesting a tailored extension of the NAA in order to continue its ongoing work to restore power to the island.

Although PREPA has restored power to approximately 97% of clients on the island, approximately 45,000 clients remain without power. Moreover, only approximately 78% of transmission lines (230 kV and 115 kV) are back in service, and a number of core transmission lines are still in the process of being restored, including two of the major transmission lines supporting the Aguirre Power Complex. Because the grid is still in a state of active repair, it remains susceptible to instability and surges, and continues to suffer blackouts and electrical system disturbances. As a result of these continuing electrical disturbances, electricity generation and distribution have not been stabilized at most of the facilities covered by the NAA, with the exception of the Costa Sur facility. These grid conditions have led to episodic instances of noncompliance associated with these electrical disturbances on the grid.

Moreover, while most of PREPA's units no longer need to operate at limited loads, damaged transmission lines still require that PREPA operate the units at the Aguirre Power Complex at limited loads. At the same time, PREPA has had to operate other units in a manner that exceeds their use restrictions to compensate for unavailability of other units that have been affected in various ways by the hurricanes. These realities continue to prevent PREPA from operating its generating facilities in the manner necessary to fully comply with the requirements covered by the NAA.

While progress has been made over the last month, many of the lingering problems PREPA is facing will not be resolved until the remaining major transmission lines are repaired. As the major blackout last week unfortunately demonstrates, the restoration of PREPA's system is by no means complete. PREPA continues to have a significant task ahead, given that 22% of its transmission lines remain out-of-service.

As PREPA strives to complete this work, it is important to recall the magnitude of the disaster PREPA has worked to recover from. Hurricane Maria is reported as making landfall on Puerto Rico as a high-end Category 4 hurricane with sustained winds of 155 mph and, according to a recent report by the National Hurricane Center, "[w]inds of category 5 intensity were almost certainly felt at some elevated locations on the island."¹ The destructive hurricane ripped straight across Puerto Rico, including its mountainous interior where many of PREPA's major transmission lines are located, and destroyed a significant portion of PREPA's transmission system. Hurricane Maria is the third most expensive hurricane in United States history, with an estimated \$90 billion in damage.²

PREPA is diligently working to restore its system after this unprecedented disaster; however, the final phase of work that remains is challenging and will take additional time. Accordingly, PREPA is requesting a tailored extension of the NAA until June 30, 2018, as described herein.

¹ David Ferris, E&E News, "Blow to Puerto Rico 'almost certainly' reached Category 5," (April 12, 2018), <https://www.eenews.net/stories/1060078579>.

² Daily Kos, "Final numbers on Maria in Puerto Rico: \$90 billion in damage, some Cat 5 winds," (April 11, 2018), <https://www.dailykos.com/stories/2018/4/11/1756129/-Final-numbers-on-Maria-in-Puerto-Rico-90-billion-in-damage-some-Cat-5-winds>.

I. Request for an Extension of the NAA with Respect to Issues Covered by the March 29, 2018 NAA Extension

The March 29 extension of the NAA grants PREPA relief through April 30, 2018, for issues arising under the Clean Air Act as they relate to PREPA's Title V permits, and the underlying applicable requirements contained therein, at PREPA's electric generating units, if those units are unable to comply due to impacts from Hurricanes Irma and Maria. More specifically, the March 29 extension of the NAA applies to any violations, actions taken, or not taken, in response to the following conditions:

- Emissions limits (including, but not limited to, opacity limits) at the Aguirre facility from operating the Aguirre facility at low-load output levels;
- Emissions limits (including, but not limited to, opacity limits) at PREPA's electric generating units other than Costa Sur and Cambalache, related to episodic electrical disturbances;
- Operation in excess of heat input limits at San Juan units 7 and 8, and Palo Seco unit 1;
- Unit and/or control equipment malfunctions, shutdowns, or restarts, except at Costa Sur and Cambalache;
- Inoperable or damaged process, production, control, or monitoring equipment (excluding all fuel analysis activities) at Aguirre unit 1; inoperable or damaged water injection equipment at the Mayaguez facility, to the extent caused by electrical disturbances; and inoperable or damaged steam injection equipment at San Juan units 5 and 6, to the extent caused by electrical disturbances;
- Compliance with the Mercury and Air Toxics Standard ("MATS") as follows:
 - Heat input limits at San Juan units 7 and 8 and Palo Seco unit 1;
 - MATS compliance at Aguirre;
 - Emissions deviations resulting from cycling problems at plants subject to MATS, other than Costa Sur; and
 - MATS testing deadlines at Aguirre Units 1-2, Costa Sur Units 5-6, San Juan Unit 9, and Palo Seco Unit 3;
- Temporary operation of mobile diesel generators to restore power and start units and auxiliary equipment; and
- The shutdown or bypass of air pollution control equipment to shed parasitic load at Mayaguez and San Juan, to the extent problems are due to electrical system disturbances.

Given that many of these issues are related to the fact that major transmission lines remain under repair, PREPA continues to encounter issues with these compliance areas as it strives to restore the grid, and issues will persist past April 30, 2018. Accordingly, based on the status of its system, PREPA is requesting that EPA extend the NAA through June 30, 2018. Below, PREPA identifies the specific areas in which it requests an extension of the NAA for violations and actions taken, or not taken, in response to the following conditions:

A. Emissions limits at the Aguirre facility from operating the Aguirre facility at low-load output levels

In its last NAA extension request, PREPA requested significantly narrower relief as it related to relief from emissions limits for operating its plants at high- or low-load output levels. PREPA requested continued relief for emissions limits at low-load output levels only for the Aguirre Power

Complex, and did not request continued relief for its remaining plants.

At the time of PREPA's last extension request, several major lines transmitting generation from Aguirre remained damaged and under repair. This damage remains and critical repair work is ongoing. Consequently, the Aguirre Power Complex must continue to operate at limited loads. For instance, on April 20, 2018, output at Aguirre was at approximately 435 MW (out of a total capacity of 1536 MW).³ While output fluctuates, PREPA continues to be able to operate only one of Aguirre's two 450 MW steam electric generating units, and has generally been able to do so only at a limited capacity. As a result, only Aguirre Unit 1 is currently in service. Unit 2 remains out-of-service due to restricted transmission availability and grid limitations. The other units at Aguirre are also not operating at significant loads, and are also limited by the damaged transmission lines.⁴

Although the distribution of load shifts between units at the Aguirre Power Complex, the overall amount of power Aguirre is able to generate is limited by the total available capacity of the transmission lines serving Aguirre, which currently remains at approximately 60%. Output from the AES coal plant, which is also located in the south, is also limited by these lines. Until the major 230 kV transmission lines that are still damaged from the hurricanes are repaired, the Aguirre Power Complex will be constrained to limited loads. As a result, Aguirre's units are continuing to experience deviations. Accordingly, PREPA requests an extension of the NAA until June 30, 2018, for emission limits due to low-load output levels at Aguirre.

B. Emissions limits at PREPA's electric generating units related to episodic electrical disturbances

In its last NAA extension request, PREPA requested continued relief for emission limits at its plants (with the exception of Costa Sur and Cambalache) related to deviations caused by cycling, bypass and failures of steam and water injection equipment, and other issues caused by electrical system disturbances, e.g., surges, instability, trips, etc. This request was narrowly tailored so that PREPA would receive relief only for the lingering episodic events that continue to occur as PREPA repairs the damage to its system caused by the hurricane.

PREPA requests an extension of the NAA with respect to this issue. As PREPA continues to repair its system, episodic electrical disturbances are occurring less frequently. However, these episodic events nonetheless continue to occur, and PREPA's plants will remain at risk for deviations due to these events until PREPA is able to complete the repair of damaged transmission lines. The grid is an interconnected system, and electrical disturbances in one part of the grid can affect plants across the island. Illustrative of this risk is the major island-wide blackout that occurred on April 18, 2018. While contractor crews were doing repair work, a major transmission line that runs from the AES coal plant in the south near Aguirre (line 50700, which runs from Salinas to Guayama) was damaged. The system tripped causing the AES and Aguirre plants to trip, and PREPA's other plants (including San Juan, Palo Seco, and Costa Sur) were automatically tripped to protect them from damage causing an island-wide blackout. PREPA is aware of opacity deviations that have occurred at Aguirre and at Palo Seco in connection with this blackout incident. Two additional blackouts have also occurred since PREPA's last request for an extension of the NAA: an April 2, 2018 blackout due

³ For instance, on April 20, 2018, approximately 358 MW of 900 MW total were online at Aguirre's steam units. On April 20, 2018, only 58 MW out of the 592 MW total were online at Aguirre's combined cycle units, and only 19 MW were online at Aguirre's 42 MW combustion turbine.

⁴ See *id.*

to a transmission line failure on a 230 kV line on the western side of the island, and an April 12, 2018 blackout, when a tree fell on a line as a contractor was conducting transmission restoration activities.

Continuing issues such as blackouts, surges, grid instability, line trips, and other electrical disturbances, mean that deviations from emission limits will likely continue to occur. For instance, blackouts cause the units to cycle, which can cause deviations. As PREPA places its units back in full service, we know from experience that emission deviations associated with opacity, NO_x, and CO will occur.

Grid issues persist and remain a significant compliance hurdle, as electrical disturbances are unpredictable and many portions of PREPA's grid remain susceptible to such episodic events. Accordingly, PREPA requests an extension of the NAA until June 30, 2018, for emission limits for all of its plants, except for Costa Sur and Cambalache, to the extent that deviations are caused by cycling and other issues resulting from electrical system disturbances.

Such electrical disturbances can also cause the inadvertent shutdown of the steam and water injection equipment to control NO_x at PREPA's units that utilize that technology, which can cause deviations. Accordingly, PREPA requests an extension of the NAA until June 30, 2018 for issues with emission limits due to failures or bypass of steam and water injection equipment at San Juan and Mayaguez caused by electrical system disturbances.

C. Operation in excess of heat input limits at San Juan Units 7 and 8 and Palo Seco Unit 1

In the March 29 NAA extension, PREPA received continued relief from the heat input limit for San Juan Units 7 and 8 and Palo Seco Unit 1, three of its generating units designated as limited-use units under MATS.⁵ PREPA is requesting an extension of the NAA for this issue for these three units.

PREPA must continue to utilize its limited-use units, because multiple PREPA generating units remain limited in various ways or are out-of-service. Of particular importance, the Aguirre Power Complex is still operating at limited loads due to ongoing damage to major transmission lines caused by the hurricanes. The situation at Aguirre—PREPA's largest baseload plant—affects power usage across the island and requires PREPA to operate its limited-use units to help meet demand.

Moreover, San Juan Unit 9 still remains out-of-service for a mandatory environmental outage that was delayed due to the hurricanes. PREPA could not perform the outage on San Juan Unit 9 until recently, because Unit 9 was one of the only units that was able to operate in the immediate aftermath of the storm and continued to be necessary to the power restoration effort until very recently. At the time of its last NAA request, PREPA had optimistically anticipated that San Juan Unit 9 would be able to return to service in early May; however, PREPA now estimates that it will be unable to complete the work until the end of May.⁶

⁵ PREPA did not request relief for its other three limited-use units (Palo Seco Unit 2 and Costa Sur Units 3 and 4).

⁶ As PREPA reported in its last extension request, Costa Sur Unit 6 was in a similar situation as San Juan Unit 9—it was necessary to delay environmental outage to continue to run the unit, because for some time, it was the only operating baseload unit at Costa Sur. With Costa Sur Unit 6 out-of-service for environmental outage, only Costa Sur Unit 5 is available, as the other two baseload units at Costa Sur (Units 3 and 4) are limited-use units and are not currently running. In its last request, PREPA anticipated that Costa Sur Unit 6 would be able to return to service by

Due to the continuing unavailability of core baseload units and ongoing transmission and grid limitations, PREPA will need to continue to have flexibility to operate San Juan Units 7⁷ and 8⁸ and Palo Seco Unit 1,⁹ as doing so remains critical to serving the island.¹⁰ Without these three limited-use units, PREPA would only have the ability to operate San Juan Units 5 and 6 and Palo Seco Unit 3¹¹ in the north.¹² PREPA thus requests an extension of the NAA for this issue for San Juan Units 7 and 8 and Palo Seco Unit 1 until June 30, 2018. By then, PREPA expects that San Juan Unit 9 will be available and hopes that Aguirre will be able to operate at normal loads and that the situation on the grid will have improved.

D. Unit and/or control equipment malfunctions, shutdowns, or restarts

PREPA requires continued relief for issues arising from the malfunction, shutdown, or start-up of its units and control equipment. While cycling is gradually becoming less of an issue, PREPA must continue to cycle its units to an unusual degree, and it continues to experience malfunctions and unscheduled shutdowns and start-ups. Grid instability, surges, and other electrical system disturbances continue to persist and, as noted above, have contributed to blackouts and caused certain units to be unable to provide power to the grid. For instance, the line trip that occurred on April 18 caused PREPA's plants across the island to trip, and resulted in an island-wide blackout.

Accordingly, PREPA requests an extension of the NAA with respect to this issue until June 30, 2018, to the extent that unit and/or control equipment malfunctions, shutdowns, or restarts occur due to electrical system disturbances. This request is narrowly tailored to ensure that it extends only to these lingering episodic events that continue to occur, such as the recent blackouts.

April 18, 2018, but completion of the outage was delayed. However, PREPA anticipates that Costa Sur Unit 6 will be able to return to service in the next few days. That said, because PREPA is bringing Costa Sur Unit 6 back online after a significant outage, PREPA will need to monitor the situation to see how it goes to ensure that there are no problems after restarting the unit.

⁷ San Juan Unit 7 is currently out-of-service for a required environmental outage. Given the current uncertainty regarding grid conditions, PREPA will need to maintain flexibility to utilize this unit to meet demand.

⁸ San Juan Unit 8 had been out of service since approximately March 25, 2018, because of high pressure steam leakage at the turbine, but was brought back into service on April 21, 2018, as it is needed to meet demand—especially given that Units 7 and 9 are out-of-service for environmental outage.

⁹ Palo Seco Unit 1 is currently out-of-service due to structural issues. However, PREPA is working diligently to rectify the situation and will need to place the unit back in service as soon as it can to meet demand. Palo Seco Unit 1 had previously been out-of-service since before the hurricane due to the structural issues at the plant, but PREPA had been able to place it back in service on January 24, 2018.

¹⁰ These units have exceeded the 8% heat input limit as measured through fuel use. See 40 C.F.R. § 63.10042 (defining the "limited-use liquid oil-fired subcategory").

¹¹ The Palo Seco combustion turbine is also currently online operating at about 41 MW as of April 20, 2018.

¹² San Juan Unit 10 has been out-of-service since before the hurricane. Palo Seco Unit 2 (limited-use) and Unit 4 have also been out-of-service since before the hurricane. San Juan Unit 9 is out-of-service for mandatory environmental outage.

E. Inoperable or damaged process, production, control, or monitoring equipment (excluding all fuel analysis activities) at Aguirre Unit 1

In its March 29 NAA extension request, PREPA explained that it was uncertain as to what equipment issues would arise at Aguirre Unit 1, given that the unit had only recently been restarted and had been back in service for a short period of time. Accordingly, PREPA requested NAA coverage for inoperable or damaged process, production, control, or monitoring equipment at Aguirre Unit 1.

Because surges are continuing to occur, Aguirre Unit 1 is cycling to an increased degree. However, PREPA is still in the process of testing and repairing some of its equipment at Aguirre that is necessary to ensure compliance during cycling and startup and shutdown situations. PREPA thus requests an extension of the NAA with respect to inoperable or damaged process, production, control, or monitoring equipment at Aguirre Unit 1 until June 30, 2018.

F. Inoperable or damaged steam and water injection equipment at San Juan Units 5 and 6 and the Mayaguez facility to the extent cause by electrical system disturbances

While PREPA has made significant progress on restoring its equipment, unpredictable electrical disturbances (e.g., grid instability, surges, line trips, etc.) continue to sporadically damage or render inoperable equipment at PREPA's plants, including the steam and water injection equipment at San Juan and Mayaguez. The potential for such events remains given that only 78% of PREPA's transmission lines are back online. Accordingly, PREPA requests a tailored extension of this condition until June 30, 2018, as it relates to inoperable or damaged steam and water injection equipment at San Juan Units 5-6 and the Mayaguez facility to the extent caused by electrical disturbances.

G. Compliance with MATS

PREPA requests an extension of the NAA with respect to compliance with MATS issues until June 30, 2018. As noted above, in terms of limited-use units, PREPA requests an extension for the heat-input limits at San Juan Units 7 and 8 and Palo Seco Unit 1. These units have exceeded their heat input limit of 8% of their maximum heat input, averaged over a 24-month block period,¹³ but their use continues to be essential to serve the island.

PREPA also requests an extension of the NAA until June 30, 2018, as it relates to MATS compliance at Aguirre. Despite PREPA's best efforts since its last extension request, Aguirre's units are still operating at limited loads, which continue to complicate or preclude full compliance with MATS requirements. As an example, PREPA has been unable to conduct quarterly testing at Aguirre, because the units have been restricted to operating at limited loads. Aguirre Unit 1 is not operating at full capacity, and Unit 2 is out-of-service due to transmission line limitations. The use of Aguirre's units thus continues to be limited due to the fact that two major transmission lines servicing Aguirre remain damaged. The Aguirre units also are facing increased cycling and equipment

¹³ See 40 C.F.R. § 63.10042 (defining the "limited-use liquid oil-fired subcategory" as "an oil-fired electric utility steam generating unit with an annual capacity factor when burning oil of less than 8 percent of its maximum or nameplate heat input, whichever is greater, averaged over a 24-month block contiguous period . . .").

problems, which have made compliance with the startup work practice standard a challenge. PREPA is in the process of implementing adjustments and repairs on the equipment to comply. Accordingly, PREPA requests an extension of the NAA as it relates to MATS compliance at Aguirre until June 30, 2018.

In addition, as described above, issues with frequent cycling continue to lead to emission deviations at PREPA's baseload units, with the exception of Costa Sur. Accordingly, PREPA requests an extension of the NAA until June 30, 2018, for emissions deviations resulting from cycling problems at its plants subject to MATS, other than Costa Sur.

And finally, such issues and other uncertainties with the grid and availability of the units, have precluded, compounded, or delayed PREPA's ability to conduct relative and correlation response audits at units subject to MATS (San Juan Unit 9, Palo Seco Unit 3, Costa Sur Units 5-6), as well as the quarterly emissions testing at Aguirre Units 1 and 2 (as noted above). PREPA is endeavoring to schedule testing for the audits, and anticipates that it will have dates to share with EPA in the near future. The units are becoming more stable, and therefore PREPA is coordinating to perform the testing on them. Once PREPA has the dates available, PREPA will notify EPA. For Aguirre, any testing will need to wait until the units are stable and operating at or near full loads. PREPA anticipates that it will be able to schedule remaining testing soon, but needs to request an extension of the NAA. Accordingly, PREPA requests an extension of the NAA as it relates to testing at its units subject to MATS until June 30, 2018.

H. Temporary operation of mobile diesel generators to restore power and start units and auxiliary equipment

PREPA requires continued relief on this issue. Although PREPA has progressively lowered its temporary operation of mobile diesel generators to restore power and start units and auxiliary equipment, grid instability still remains a significant concern and a massive blackout occurred as recently as April 18, 2018, as described in more detail above. Moreover, transmission lines are still damaged in certain areas, necessitating PREPA's continued use of generators.

As one example, use of the generators at Palo Seco remains necessary because of the continuing limitations on PREPA's ability to operate Aguirre; these generators are operating at all times and remain key to ensuring reliability in the northern part of the island. As another example, the use of generators at Yabucoa is currently functioning as a micro grid as they are providing power to discrete areas only. These generators remain essential to restoring power, because of damage to the transmission lines servicing Yabucoa and the continued inability to rely on power from the Aguirre plant. Illustrative of the fact that these generators are still needed to ensure power stability on the island, the U.S. Army Corps of Engineers recently extended its contract for their use until the end of May.

In sum, while PREPA is making progress on its use of mobile diesel generators, PREPA still requires flexibility to be able to operate mobile diesel generators on an as needed basis to restore power and to start its units and equipment. Accordingly, PREPA requests that EPA extend the NAA with respect to this issue until June 30, 2018.

I. Shutdown or bypass of air pollution control equipment to shed parasitic load at Mayaguez and San Juan, to the extent problems are due to electrical disturbances

PREPA requires continued relief as to this issue. In the past, shutdowns and malfunctions of this equipment have occurred at the San Juan and Mayaguez facilities due to episodic electrical disturbances, such as line failures, surges, and blackouts. Blackouts, surges, and other disturbances are continuing to occur and could cause similar issues in the future. Accordingly, PREPA requests a limited extension of the NAA with respect to this issue until June 30, 2018, but only to the extent that such problems occur at the San Juan and Mayaguez facilities due to electrical disturbances.

J. Operating emergency generators using fuel with sulfur content up to 0.05% sulfur, where such fuel was added to the generator's fuel tank prior to February 1, 2018

In PREPA's March Status Report, PREPA had reported that there was still legacy 0.05% sulfur fuel in the emergency generator and tank at Mayaguez. PREPA stated that it planned to either perform a lab analysis on the sulfur content of the fuel or would remove the legacy fuel before March 30, so that it would no longer continue to be an issue. In PREPA's March 29 NAA extension request, PREPA informed EPA that Mayaguez had been unable to perform the testing in time, so PREPA would remove the legacy fuel. Accordingly, PREPA did not request an extension of the NAA with respect to this issue.

However, PREPA did not remove the legacy fuel by Friday, March 30, and on Monday, April 2, a blackout on the western side of the island occurred due to a 230 kV line failure. PREPA utilized the fuel in response to the blackout. Subsequent testing of the fuel indicated that the fuel was within specifications and in compliance. PREPA is reporting this issue because of the commitments it made in its March 29 NAA extension request.

K. Reporting and recordkeeping requirements

PREPA requests an extension of the NAA as it relates to the reporting and recordkeeping requirements identified in the December 19 amendment and January 31 and March 29 extensions of the NAA. The March 29 extension grants PREPA relief through April 30, 2018, for issues related to reporting and recordkeeping requirements under the Clean Air Act.¹⁴

PREPA is using its best efforts to comply with its reporting and recordkeeping obligations and has already submitted a number of reports covered by the NAA. As of the date of the March Status Report, PREPA had submitted: the Q3 2017 Quarterly Excess Emissions and Method 9 Reports for the Aguirre and Palo Seco facilities; the Q3 2017 Quarterly Excess Emissions Report for the Cambalache facility; the Q3 2017 Quarterly Excess Emissions and Monitoring Report for the Costa Sur facility; the Semi-Annual Heat Input Report for the Costa Sur facility for April 2017 to September 2017; the Monthly Vanadium/Asphaltene Reports for all facilities for August 2017, September 2017, and October 2017; the Annual Emergency Generators Report for the Aguirre and Costa Sur facilities for 2016 to 2017; the Title V Semi-Annual Monitoring Report for all facilities for

¹⁴ Specific reporting requirements that were covered by the December 19 amendment to the NAA are identified in Table A of that document, and are also carried over into Table A of the January 31 and March 29 extensions.

the first half of 2017; and the Semi-Annual Emergency Generator Compliance Report for Palo Seco for the second half of 2017.

Since the March Status Report, PREPA has submitted several additional reports, including the Q4 2017 Quarterly Excess Emissions and Method 9 Reports for the Aguirre and Palo Seco facilities; the Monthly Vanadium/Asphaltene Fuel Quality Report for all facilities for November 2017; and the Q4 2017 Quarterly Excess Emissions Report for the Cambalache facility. In addition, PREPA is close to completing several additional reports that will be submitted in the near future. These reports include the Title V Semi-Annual Monitoring Reports for all facilities for the second half of 2017, and the Monthly Vanadium/Asphaltene Reports for all facilities for December 2017 and January 2018.

PREPA is thus making progress on its reporting obligations and will continue to submit required reports for its facilities as soon as it is able to complete them. As PREPA has reported in prior submissions, personnel diversions have been necessary to respond to the challenging operational landscape created by the enduring damage to PREPA's system, and many of PREPA operations personnel have been working 24-hour day shifts to assist in operating PREPA's generation fleet. Nonetheless, personnel are currently in the process of transitioning back to their normal duties. The process of returning personnel to ordinary duties is occurring more quickly at PREPA's baseload plants, while personnel at the smaller combustion turbines are still dividing their time between compliance, maintenance, and operational tasks.

As they return to normal duties, personnel will seek to collect and assemble the required information as soon as possible, but this process will take time. PREPA still faces a considerable backlog, and completing all of the required reporting since the hurricanes will thus take some time. Moreover, although unrelated to the hurricane, PREPA suffered a significant communications setback when its system was hacked in mid-March as a part of a large cyber attack. As a result of the attack, PREPA lost work related to reporting that it had already entered into the system that had to be redone. PREPA is still recovering from the effects of this attack.

Given the significant backlog of reports—in addition to any lingering restoration efforts PREPA's personnel may be called upon to assist with—PREPA requests that EPA extend the NAA for reporting and recordkeeping issues until June 30, 2018. PREPA's request includes continued NAA coverage for the timely submission of the reports identified in Table A of the March 29 extension, as well as other Clean Air Act reports for each generation facility that come due while the NAA is in place.

II. A Tailored Extension of the NAA is Necessary to Protect the Public Welfare and is in the Public Interest

As described above, PREPA is requesting an extension of the NAA that is closely tailored to the current problems PREPA is still facing. An extension of the NAA is necessary to protect public welfare as PREPA and the Commonwealth of Puerto Rico continue to respond to the extreme circumstances created by Hurricanes Irma and Maria. PREPA has made significant progress and is getting ever closer to its goal of restoring power to the entire island. Recent estimates indicate that approximately 97% of clients have power, but vital work remains to get that number to 100%. Given that the grid is still suffering from instability and surges and that significant damage continues to affect core PREPA transmission lines, with 22% of lines remaining out-of-service, PREPA continues

to have issues with the conditions covered by the NAA, as described above. As such, a tailored extension of the NAA is merited for the most persistent problems affecting PREPA's system, and PREPA thus requests an extension of the NAA until June 30, 2018.

The residents of the island need to have power restored as quickly as possible and to ensure that happens PREPA needs to maintain the flexibility required to provide that power as quickly and to the greatest extent. That flexibility is clearly in the public interest given the extremely unusual circumstances produced by the hurricanes. Extending the NAA will ensure the swiftest resumption of power to the island.

PREPA will continue to provide further information to EPA as it becomes available. PREPA will further use its best efforts in keeping EPA abreast of the restoration of its grid and its progress towards a resumption of normal operations.

PREPA knows that EPA is taking all possible measures to assist the Commonwealth of Puerto Rico respond to, and recover from, the hurricanes, and we continue to stand ready to support the agency in those measures. We look forward to hearing from you soon.

Respectfully submitted,



Adam Kushner

Partner

adam.kushner@hoganlovells.com

D +1 202 637 5724

Cc: Mr. Lawrence Starfield, Principal Deputy Assistant Administrator
Mr. Peter Lopez, Regional Administrator, EPA Region 2
Mr. Eric Schaaf, EPA Region 2 Counsel
Ms. Carmen Guerrero, Director, EPA Caribbean Environmental Protection Division
Ms. Tania Vázquez Rivera, President, Puerto Rico Environmental Quality Board
Mr. John Fogarty, Associate Director, EPA Office of Civil Enforcement
Ms. Apple Chapman, Deputy Director, EPA Air Enforcement Division
Mr. Gregory Fried, Chief, EPA Stationary Source Enforcement Branch
Mr. Peter Flynn, Senior Attorney, U.S. Department of Justice